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January 10, 2023

VIA ECF

Hon. Robert M. Levy
United States Magistrate Judge
United States District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Singer v. Bank of Palestine*, No. 19-cv-0006 (ENV)(RML)

Dear Judge Levy:

In accordance with the Court's docket order of December 1, 2022, we write on behalf of all parties to provide a status report concerning the parties' further discussions with respect to the additional review of Tape 6 by an independent vendor.

The parties have engaged in meet and confer communications regarding the independent vendor review, including but not limited to a meet-and-confer teleconference on January 6, which addressed, among other matters, the selection of a vendor and a protocol to govern the review. Plaintiffs have prepared a draft protocol, and BOP has provided Plaintiffs with a markup of proposed revisions thereto. Plaintiffs further advised that they have communicated with potential independent vendors to conduct the review of Tape 6, and that they would provide written proposals from those potential vendors to BOP when available.

BOP has provided Plaintiffs with responses to Plaintiffs' written follow-up questions regarding Sullivan|Strickler's review of Tape 6 and Tape 23.

The parties anticipate completing their meet and confer efforts within the next 2-3 weeks. Accordingly, the parties respectfully propose to submit a further status report no later than January 31, 2023.

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VIA DHL

Robert M. Levy
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Respectfully submitted,

/s/ Gassan A. Baloul
Gassan A. Baloul